

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

JOHN DOE,

Plaintiff,

v.

WASHINGTON AND LEE
UNIVERSITY,

Defendant.

Civil Action No. 6:19-cv-00023-NKM

MOTION TO PROCEED UNDER PSEUDONYM BY PLAINTIFF

Plaintiff, through his undersigned counsel, hereby moves for the following relief: (1) that the parties and any and all other persons filing documents in the above-captioned matter be required to refer to Plaintiff as “John Doe”; (2) that the parties and all other persons filing documents in the above-captioned matter be required to refer to the female complainant in the underlying disciplinary matter as “Jane Roe”; (3) that any student witnesses in the underlying disciplinary proceedings shall be referred to only by pseudonym; and (4) that access to the actual identities of the above in connection with this matter shall be limited only to this Court and the parties.

Plaintiff relies upon the attached Declaration of Plaintiff “John Doe” (Exhibit A); a Motion for Leave to Proceed Under a Pseudonym that he filed in the Circuit Court for Rockbridge County, Virginia, in September 2017 (Exhibit B); the Order granting that Motion (Exhibit C); and the contemporaneously filed Brief in Support of Motion to Proceed Under Pseudonym by Plaintiff.

Respectfully,

s/David G. Harrison

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Counsel for Plaintiff

Date: April 24, 2019

CERTIFICATE

I certify that on April 24, 2019, I sent a copy of the foregoing Motion for Admission *Pro Hac Vice* by first-class mail to:

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Counsel for Washington and Lee University

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Washington and Lee University
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Lexington, VA 24450-2116

Registered Agent for Washington and Lee University

I further certify I sent a copy of foregoing Motion for Admission *Pro Hac Vice* by email
to:

R. Craig Wood, Esq
cwood@mcguirewoods.com

s/David G. Harrison
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